

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

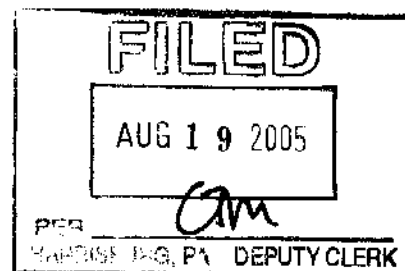
ENJOLI BRANDT

: CR. NO. 1:05-CR-323  
:  
: (Judge CALDWELL)  
:  
:

INFORMATION

INTRODUCTION

THE UNITED STATES OF AMERICA ALLEGES THAT:



At all times material and pertinent to this Information:

1. The defendant, **ENJOLI BRANDT**, was employed at the Reaching Out Personal Care Home, a residential care facility owned and operated by Tina Fake and Clifford Fake.
2. Between 2000 and March 2005 various conspirators known to the defendant, including Tina Fake and Clifford Fake, participated in, and were reimbursed for, care which the conspirators claimed to provide to care dependant individuals, including, aged, sick, elderly and infirm patients through health care benefits programs funded, in part, by the Commonwealth of Pennsylvania.
3. These programs were "health care benefit programs", as defined by Title 18, United States Code, Section 24(b) in that the programs were public plans, affecting commerce, under which medical benefits, items and services are provided to individuals.

4. Specifically, these programs were federal and state funded programs designed to provide long-term care to needy individuals, with limited financial resources, who require assistance in the activities of daily living.

5. In order to qualify to receive payments from these programs, health care providers like Tina and Clifford Fake, who employed the defendant, must prepare a patient care plan which is approved by state officials. This care plan must outline the care provided to patients by the health care provider, and must meet specified standards of appropriate care for these care dependant individuals, who include elderly, sick and infirm persons.

6. Once the care plans are approved, payments are then made to upon time sheets which the conspirators prepared and submitted by the conspirators, time sheets which claimed to describe the time spent providing care and assistance to specific program participants.

7. Between 2000 and March 2005, payments of more than \$200,000 were made to various conspirators acting at the direction of Tina and Clifford Fake, through these programs. These payments were made with the express understanding that the conspirators were providing the level of care described in the care plans, and had delivered the hours of care for each person described in the time sheets submitted by the conspirators.

8. Beginning in 2000 and continuing up through March 2005, in Lebanon County within the Middle District of Pennsylvania and elsewhere, various conspirators, including Tina Fake and Clifford Fake and others known and unknown to the United States, devised a conspiracy and scheme to defraud these health care benefit programs, and the poor, elderly, sick, infirm and care dependant persons who received care under this program, and to obtain money and property from and through these programs by means of false and fraudulent pretenses, representations and promises.

9. It was part of this conspiracy and scheme to defraud that the conspirators would:

(A) Submit false and fraudulent time sheets for payment under these programs, time sheets which claimed that extensive, direct care was provided by the conspirators to specific elderly, infirm, care dependant persons when, in truth and in fact, as the conspirators then well knew, the hours of care claimed on the time sheets had not been provided to these individuals, and that in many instances the signatures of these individuals had been forged on the time sheet forms.

(B) Submit false and fraudulent care plans, care plans which stated that persons entrusted to the care of the conspirators received personal assistance, medical treatment, and caring aid in their activities of daily living when, in truth and in fact, as the conspirators then well knew, these elderly,

infirm, care dependant persons were subjected to frequent episodes of neglect and abuse at the hands of various conspirators.

(C) Take narcotic controlled substances meant for the care and treatment of elderly, infirm, care dependant persons, and instead divert those narcotics for unlawful use by the conspirators.

(D) Conceal these acts of fraud, neglect, abuse and illegal drug diversion from state officials, and concerned relatives of the persons under the care of the conspirators.

COUNT I

**THE UNITED STATES OF AMERICA CHARGES THAT:**

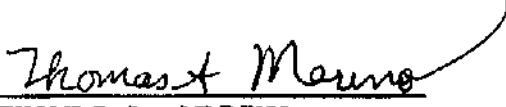
10. The United States incorporates by reference as though fully set forth herein the Introduction of the Information.

11. Beginning on or about dates unknown to the United States and continuing up through on or about April 2005, in Lebanon County and within the Middle District of Pennsylvania, the defendant-

**ENJOLI BRANDT**

having knowledge of the actual commission of felonies cognizable by a court of the United states; namely, conspiracy, health care fraud, false statements in connection with health care benefit programs, as well as acquisition and possession of controlled substances through fraud and deception, in violation of Title 18, United States Code, Sections 371, 1035, 1347, and Title 21, United States Code, Section 843(a)(3), by Tina Fake, Clifford Fake, and others, knowingly concealed and did not as soon as possible make known the same to a judge and persons in civil authority under the laws of the United States.

All in violation of Title 18, United States Code, Section 4.

  
**THOMAS A. MARINO**  
**UNITED STATES ATTORNEY**

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**DATE**